



August 09, 2007

Via Electronic Filing

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 07-52

Dear Ms. Dortch:

Nortel is submitting this letter into the record of this proceeding to eliminate confusion regarding its views on the need for regulation of the Internet. The Computer and Communications Industry Association ("CCIA") filed comments (June 15th, 2007) and reply comments (July 16th 2007) in the above-referenced proceeding. Although Nortel was a member of CCIA at that time, we want to make clear that those comments of the association do not reflect Nortel's views.

Nortel believes strongly that any dialogue regarding the potential regulation of the Internet must be based on a solid understanding of the fundamentals of today's Internet – a vastly different infrastructure serving dynamic new applications far removed from its earlier incarnations as a transport mechanism for the web traffic of academia and consumers. Today's Internet – which has been able to evolve and flourish in the relative absence of regulatory restrictions – is an intelligent infrastructure that is the backbone and foundation of much of the world's commerce. It is also an infrastructure that continues to grow in terms of capability and capacity, and in terms of the escalating demands being placed on it.

Unlike the comments filed by CCIA, Nortel believes that the FCC has wisely refrained from burdening this still-evolving medium with regulations, except in those cases where the need for policy action has been clear and could be tailored to address a specific concern. Nortel believes that there is no need for policymakers to change this position. The Internet has benefited greatly from the relative absence of regulatory restrictions, and the future of the Internet is very much dependent on constant innovation to meet the increasing demands being placed on it. To continue to thrive, the Internet must remain free from any barriers that hinder the ability to introduce innovation and intelligence. Furthermore, a restrictive regulatory environment could have the unintended effect of dissuading companies from investing in broadband networks.



Nortel will be filing a paper in this proceeding which will provide additional details concerning our views. We did, however, want to clarify that we do not concur with CCIA's filings in this proceeding.

Sincerely,

/s/ Raymond L. Strassburger

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